



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

June 9, 1994

Jane Perkins, Treasurer
Democrats 2000
1311 L Street, NW, Suite 300
Washington, DC 20005

Identification Number: C00230342

Reference: 30 Day Post-Runoff (1/1/93-5/24/93), Mid-Year
[1/1/93-6/30/93] and Year End (7/1/93-12/31/93)
Reports

Dear Ms. Perkins:

This letter is to inform you that as of June 8, 1994, the Commission has not received your response to our requests for additional information, dated May 18, 1994. Those notices requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Jennifer K. Wall on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

MAY 18 1994

Jane Perkins, Treasurer
Democrats 2000
1311 L St., NW, Suite 300
Washington, DC 20005

Identification Number: C00230342

Reference: Year End Report (7/1/93-12/31/93)

Dear Ms. Perkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses what appears to be in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33 (copy attached), the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with administrative and fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the Federal account.

Three steps were outlined by the opinion regarding the reporting of these in-kind donations: On Schedule H3, the "committee should first disclose a transfer (in-kind) from the non-federal account for the in-kind donation." Also reported on Schedule H3 should be the date the committee receives the in-kind donation, the full amount of the in-kind donation (transfer) and the particular administrative or fundraising event in which the in-kind donation was received. On Schedule H4, "the committee should make two separate entries, the first of which discloses the use or 'expenditure' of the in-kind donation, "and the second of which reflects advance or contemporaneous payment of" the Federal's share of the in-kind donation by the Federal account to the non-federal account. This payment should be made the same day the in-kind donation is transferred to the Federal account.

In order to comply with Advisory Opinion 1992-33, your committee needs to file an amended report with appropriate entries on Schedule H3 and H4 correctly disclosing in-kind donations accepted from your non-federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Jennifer K. Wall

Jennifer K. Wall
Reports Analyst
Reports Analysis Division

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